

**Soil Management Plan Wastewater
Treatment Unit Upgrade Project
Momentive Performance Materials Inc.
Sistersville, West Virginia**

1.0 Introduction

The Momentive Performance Materials Inc. (Momentive) Sistersville, West Virginia facility is in the process of upgrading its wastewater treatment unit (WWTU). A portion of the work to be performed will require subgrade excavation work in a potential polychlorinated biphenyl (PCB) - impacted area to accommodate various structures, foundations and conveyances. These work areas include a 26-foot deep pump station; an electrical building and associated backup generator; a 120-foot diameter, 2.2 million gallon equalization (EQ) tank; and various conveyance lines. The locations of these areas are shown on Figure 1 along with a sampling grid identifying the locations of previous PCB characterization data collected at the site. Each sample grid box shown on Figure 1 represents an approximate 10 feet by 10 feet area, and PCB analytical results associated with various depths at each grid location are presented in Table 1.

The purpose of this Soil Management Plan (SMP) is to provide guidelines and controls to assure the proper handling, characterization and disposal of potentially impacted soil. This SMP is divided into four sections: 1.0 Introduction; 2.0 Waste Characterization, Staging and Disposal; 3.0 Site Controls; and 4.0 Documentation and Reporting.

2.0 Waste Characterization, Staging and Disposal

As shown on Figure 1 and Table 1, previous investigations conducted at the site provide an extensive data set necessary to characterize all soil to be removed at the pump station, electrical building and associated backup generator, and a significant portion of the conveyance lines. These pre-characterization data indicate the presence of soil containing PCBs at concentrations greater than 50 milligrams per kilogram (mg/kg) that will require disposal at a Toxic Substances Control Act (TSCA) – approved landfill. While there are discrete locations and depth intervals that exhibit PCB concentrations below

50 mg/kg, Momenive has conservatively elected to dispose of all material removed from within the sample grid areas as TSCA – regulated material.

Areas to be excavated that lie outside the sample grid area include a portion of the conveyance piping and the EQ tank. The EQ tank will be supported by an auger cap pile deep foundation system. Drilling spoils generated will be removed for disposal, and Sonotube® fiber forms will be inserted as a barrier between the open hole and concrete and/or grout. Dust control measures described in Appendix A (PCB Health and Safety Plan) will be implemented to prevent fugitive dust from becoming airborne while drilling. All waste materials generated during subgrade work in these areas will be segregated as follows and characterized post-removal for waste classification and disposal purposes:

- The areal footprint of the 120-foot diameter EQ tank will be divided into four equal quadrants, each of which will be staged separately pending waste characterization.
- Soil excavated for the conveyance lines that lie outside the sample grid area will likewise be segregated and staged pending waste characterization.

All waste materials generated will be temporarily staged in a waste staging area pending disposal. The temporary staging area (TSA) will be underlain by a 20 – mil thick high density polyethylene (HDPE) liner and covered with polyethylene sheeting (or equivalent geosynthetic tarp) and secured by weights at the conclusion of each day or as otherwise required to prevent stormwater run-on or run-off. The TSA will be segregated into sections as described above using sandbags and/or hay bales as internal barriers. The base of the TSA will be graded prior to placement of liner material to ensure a smooth surface and proper drainage.

Waste materials that have not been pre-characterized, i.e., those associated with the EQ tank and portions of the conveyance line, will be characterized following placement into the TSA or standard roll-offs to be used for subsequent transportation and disposal. If sampled at the TSA, each stockpile segment will be sampled on 50-foot centers and two-

foot depth intervals. If sampled in the roll-off container, one composite sample comprised of three representative aliquots will be collected from each container. In either case, the samples will be field screened for PCBs using immunoassay screening techniques (EPA Method 4020) to determine appropriate disposal methods.

All pre-characterized waste materials and post-removal characterized materials determined to contain PCBs at concentrations equal or greater than 50 mg/kg will be disposed at a TSCA – approved landfill. All post-removal characterized materials determined to contain PCBs at concentrations less than 50 mg/kg will be disposed at an approved municipal solid waste landfill. All waste materials will be transported by a licensed and approved transporter, and appropriate waste manifest forms will be completed and submitted.

3.0 Site Controls

The following site controls will be established in addition to those previously described to ensure proper containment and safe handling of all waste materials prior to disposal:

- All equipment used for augering, excavation, loading and transport will be decontaminated between uses at each defined area using a combination of low pressure wet washing and dry decontamination methods, as appropriate to minimize the risk of spreading contamination. Decontamination will be performed in a designated, protected decontamination area, and any spent water generated will be passed through a sediment bag to remove solids prior to discharge.
- The downslope perimeters of areas where subgrade removals are to be performed or waste materials are to be placed, including the TSA and decontamination areas, will be surrounded by wire-backed silt fence and wattles (or hay bales).
- All decontamination waste and site control materials will be disposed at a TSCA – approved landfill at the conclusion of the work.
- All personnel involved in project execution will be 40-hour trained in accordance with Occupational Health and Safety Administration (OSHA) Hazardous Waste Operations and Emergency Response (HAZWOPER) standards.

- **See Appendix A for PCB Health and Safety Plan.**
- All work will be performed in conformance with established Momenive Sistersville Plant policies and procedures including policies contained in its Safety and Health Procedures Manual.

4.0 Documentation and Reporting

A final report documenting conformance with provisions of this plan and summarizing all waste characterization data generated and the disposition of all waste materials will be prepared upon completion of the WWTU upgrade project. Analytical reports, waste disposal manifests, and any required inspection forms will be kept on file with other project records in accordance with established Momenive recordkeeping requirements.

Appendix A

PCB Health and Safety Plan Addendum to Soil Management Plan Wastewater Treatment Unit Upgrade Project Momentive Performance Materials Inc. Sistersville, West Virginia

1.0 Introduction

The Momentive Performance Materials Inc. (Momentive) Sistersville, West Virginia Plant is in the process of upgrading its wastewater treatment unit (WWTU). A portion of the work to be performed will require subgrade excavation and subsequent handling of polychlorinated biphenyl (PCB) impacted soil as described in the companion Soil Management Plan (SMP). This PCB Health and Safety Plan (HASP) has been prepared to present potential PCB exposure hazards associated with the work and define control measures to properly protect personnel performing the work.

2.0 Exposure Hazards

PCBs are organic chlorine compounds with the formula $C_{12}H_{10-x}Cl_x$. They represent a group of 209 different chemicals which share a common structure, but vary in the number of attached chlorine atoms. PCBs were once widely used as dielectric and coolant fluids in electrical apparatus, carbonless copy paper and in heat transfer fluids. Because of their environmental toxicity and classification as persistent organic pollutants, the United States Congress banned their production in 1979. PCBs are considered to be possible carcinogens, and persons exposed directly to high levels of PCBs, either via the skin, by consumption, or in the air, have experienced irritation of the nose and lungs, skin irritations such as severe acne (chloracne) and rashes, and eye problems.

The Occupational Safety and Health Administration (OSHA) promulgated its permissible exposure limits (PEL) of 1 milligram per cubic meter of air (mg/m^3) for chlorodiphenyl products containing 42% chlorine and $0.5 mg/m^3$ for chlorodiphenyl products containing

54% chlorine determined as 8-hour time-weighted average (TWA) concentrations. These values are based on the prevention of liver injury in exposed workers. PCBs can irritate the skin and eyes, and exposure can occur both through inhalation and direct contact. Hazardous substance fact and material safety data sheets for PCBs are attached for reference.

3.1 Exposure Prevention and Control

Exposure to PCB impacted soil can be mitigated by proper workplace controls and practices. These controls and practices include:

- Real time monitoring for respirable dust;
- Dust control measures;
- Use of appropriate personal protective equipment; and
- Employee training.

3.2 Air Monitoring

Real time air monitoring will be performed using a field portable monitor that displays airborne dust concentrations immediately and continuously on a digital liquid crystal display (LCD) screen in units of mg/m^3 with a data logging feature. These units employ light scattering detectors with a built in power source and are referred to as real-time aerosol monitors (RAMs) or personal dataRAM (PDRs). Calibration will be performed in accordance with the manufacturer's instructions, and area monitoring will be performed in all work areas where PCB impacted soils are expected or known to be present.

3.3 Dust Control Measures

All work will be performed in a manner that will minimize generation of airborne dust and particulates. Dust suppression measures will be implemented whenever dust is visible. Dust control techniques, such as low volume water spraying or fogging, will be used to minimize the potential for inhalation of

particulates. Real time air monitoring readings above 0.5 mg/m³ will require implementation of more aggressive dust control measures.

3.4 Personal Protective Equipment

The OSHA Personal Protective Equipment Standard (29 CFR 1910.132) requires employers to determine the appropriate personal protective equipment for each hazard and to train employees on how and when to use protective equipment. The materials of concern identified at this site are PCBs and nuisance dust. Based on site experience and analytical data, most tasks will be conducted in Level D. Tasks where direct contact with PCBs is possible will be conducted in Modified Level D to provide additional dermal protection. Each of these levels of protection is summarized below:

Level D

- flame resistant long-sleeve shirts and pants (required within the Facility boundaries);
- leather steel-toe work boots, meeting American National Standards Institute (ANSI) Z41;
- safety glasses with side shields or goggles, meeting ANSI Z87;
- hard hat, meeting ANSI Z89;
- hearing protection (if noise levels exceed 85 dBA, then hearing protection with an EPA Noise Reduction Rating (NRR) of at least 20 dBA must be used); and
- gloves where required (i.e. soil sampling).

Modified Level D

- flame resistant long-sleeve shirts and pants (required within the Facility boundaries);
- nitrile gloves worn over nitrile surgical gloves;

- latex/polyvinyl chloride (PVC) overboots when contact with PCB-impacted soil is anticipated;
- leather steel-toe work boots, meeting ANSI Z41;
- safety glasses or goggles, meeting ANSI Z87;
- face shield in addition to safety glasses or goggles when projectiles or splash hazards exist;
- hard hat, meeting ANSI Z89;
- hearing protection (if noise levels exceed 85 dBA, then hearing protection with an EPA NRR of at least 20 dBA must be used); and
- Tyvek® suit (polyethylene coated Tyvek® suits for handling liquids) when body contact with PCB-impacted soil is anticipated.

3.5 Employee Training

All personnel who work in areas where they may be exposed to PCBs must be trained as required by OSHA Regulation 29 CFR 1910.120 (HAZWOPER). Field employees also must receive a minimum of three days of actual field experience under the direct supervision of a trained, experienced supervisor. Personnel who completed their initial training more than 12 months prior to the start of the project must have completed an eight-hour refresher course within the past 12 months.

KEY
< 1ppm (Clean)
1-25 ppm (landfill)
25-50 ppm (landfill)
> 50 ppm (off site)

Table 1

Wastewater Treatment Unit Upgrade Project PCB Analytical Results ¹

				FF5	EE5	DD5	CC5	BB5	AA5
				0-4 = 2.24 4-8 = 8.66 CONC = 0.81 9-12 = ND 12-16 = ND 16-20 = 0.14	0-4 = 0.12 4-8 = 3.37 8-12 = 0.65 12-16 = 9.29 16-20 = 19.5	0-4 = 0.27 4-8 = ND 9-9 CONC = 0.13 9-12 = 0.26 12-16 = 2.81 16-20 = 0.12	0-4 = 2.41 4-8 = 0.1 8-9 CONC = 0.23 9-12 = 6.32 12-16 = 4.36 16-20 = ND	0-4 = ND 4-8 = ND 8-11 = ND 11-12 CONC = ND 12-16 = 24.9 16-20 = 0.16	0-4 = ND 4-8 = 1.22 7-8 CONC = 0.16 8-12 = 7.29 12-16 = ND 16-20 = 3.59
JJ6	II6	HH6	GG6	FF6	EE6	DD6	CC6	BB6	AA6
0-4 = 0.87 4-8 = 0.8 8-12 = 11.4 12-16 = 1.38 16-20 = ND	no need	no need	0-3 = ND CONC = 0.31 4-8 = 3.13 8-12 = 1.22 12-16 = ND 16-20 = 1.73	0-3 = ND 3-4 CONC = 1.18 4-8 = 14.9 8-12 = 34.4 12-16 = 47.6 16-20 = 4.16	0-4 ? = 0.14 3-4 CONC = 0.26 4-8 = 10.6 8-12 = 19.9 12-16 = 33.4 16-20 = 0.32	0-4 = 47 4-8 = 16.6 8-12 = 3.44 12-16 = 3.95 16-20 = 0.41	0-3 = 0.19 3-4 CONC = 0.25 4-8 = 9.43 8-12 = 33.3 12-16 = 4.76 16-20 = ND	0-4 = 0.81 4-8 = 74.1 8-12 = 40.5 12-16 = 0.54 16-20 = 0.13	0-4 = 6.04 4-8 = 31.4 8-12 = 91.3 12-16 = 54.2 16-20 = 28.7 20-24 = 0.64
			GG7	FF7	EE7	DD7	CC7	BB7	AA7
				0-4 = 12.1 4-8 = 36 8-12 = 3.35 12-16 = ND 16-20 = 369	0-4 = 0.8 4-8 = 4.51 8-12 = 53.2 12-16 = 0.14 16-20 = 4.73	0-4 = 35.2 4-8 = 26.5 8-12 = 26.3 12-16 = 0.19 16-20 = ND	0-4 = 2.02 4-8 = 2.45 8-12 = 0.29 12-16 = 1.67 16-20 = 0.21	0-4 = 3.4 4-8 = 0.33 8-12 = ND 12-16 = ND 16-20 = 1.66	0-4 = 0.29 4-8 = 0.31 8-12 = ND 12-16 = 0.48 16-20 = ND
				FF8	EE8	DD8	CC8	BB8	AA8
					0-4 = ND 4-8 = 9.68 8-12 = 0.39 12-16 = ND 16-20 = ND	0-4 = 4.1 4-8 = 2.25 8-12 = ND 12-16 = ND 16-20 = ND	0-4 = 51.9 4-8 = 1.59 8-12 = 0.11 12-16 = ND 16-20 = ND	0-4 = 32 4-8 = 0.6 8-12 = ND 12-16 = 9.75 16-20 = ND	0-4 = 4.78 4-8 = 119 8-12 = 187 12-16 = 126 16-20 = 3.06
							CC9	BB9	AA9
							0-4 = ND 4-8 = 0.1 8-12 = 0.12 12-16 = 0.71 16-20 = 1.38	0-4 = 0.25 4-8 = ND 8-12 = ND 12-16 = ND 16-20 = ND	0-4 = ND 4-8 = ND 8-12 = ND 12-16 = ND 16-20 = ND

¹ See Figure 1 for sample grid locations

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A1 Master = ND 0-4 = N/A 4-8 = N/A 8-12 = N/A 12-15 = N/A 15-16 CON = 0.065 16-20 = 0.073	B1 Master = ND 0-4 = ND 4-8 = ND 8-12 = ND 12-15 = ND 15-16 CONC = 0.11 16-20 = 0.13	C1 Master = ND 0-4 = ND 4-8 = ND 8-12 = ND 12-15 = ND 15-16 CON = 1.23 16-20 = 0.1	D1 Master = ND 0-4 = N/A 4-8 = N/A 8-12 = N/A 12-16 = N/A 15-16 CON = 0.2 16-20 = ND	E1 Master = ND 0-4 = N/A 4-8 = N/A 8-12 = N/A 12-16 = N/A 15-16(CON?) = ND 16-20 = ND	F1 Master = 0.139 0-4 = N/A 4-8 = N/A 8-12 = N/A 12-16 = N/A 15-16(CON?)=ND 16-20 = 0.33	G1 Master = ND 0-4 = N/A 4-8 = N/A 8-12 = N/A 12-16 = N/A 15-16(CON?)=0.12 16-20 = 1.48	H1 Master = 0.087 0-4 = 0.188 4-8 = ND 8-12 = ND 15-16 CON = 0.11 16-20 = ND
A2 Master = 0.09 0-4 = ND 4-8 = ND 8-12 = ND 12-15 = ND 15-16 (CON?) = ND 16-20 = ND	B2 Master = 0.40 0-4 = 0.46 4-8 = 0.488 8-12 = ND 12-15 = ND 15-16 CONC = 0.75 16-20 = 0.12	C2 Master = 0.34 0-4 = ND 4-8 = ND 8-12 = ND 12-15 = ND 15-16 (CON?) = ND 16-20 = 0.27	D2 Master = 0.176 0-4 = ND 4-8 = 0.268 8-12 = ND 12-16 = 0.101 15-16 CON = ND 16-20 = ND	E2 Open Excavation 8-12 = 0.51 12-15 = ND 16-15 CON = 0.88 16-20 = 0.43	F2 Open Excavation 8-12 = 0.27 12-15 = ND 15-16 CON = 0.3 16-20 = 2.43	G2 Open Excavation 8-12 = ND 12-15 = ND 15-16 CON = ND 16-20 = ND	H2 Master = 0.079 0-4 = 0.098 4-8 = ND 8-12 = 0.059 11-12 CON = ND Comp = ND
A3 Master = 0.50 0-4 = ND 4-8 = ND 8-12 = ND 12-15 = 0.976 15-15(CON?)=0.11 16-20 = 0.74	B3 Master = 0.159 0-4 = 0.165 4-8 = ND 8-12 = ND 12-15 = 0.272 15-16(CON?)=0.32 16-20 = 0.815	C3 Master = 0.331 0-4 = 0.21 4-8 = ND 8-12 = ND 12-15 = ND 15-16(CON?)=0.081 16-20 = 0.051	D3 Master = 1.28 0-4 = 0.067 4-8 = 0.132 8-12 = 0.414 12-16 = 0.597 15-16 CON = 17.7 16-20 = 0.29	E3 Open Excavation 8-12 = ND 12-15 = ND 15-16 CON = 1.41 16-20 = ND	F3 Open Excavation 8-12 = 1.5 12-15 = ND 15-16 CON = 1.48 16-20 = 0.36	G3 Open Excavation 8-12 = ND 12-15 = ND 15-16 CON = 0.46 16-20 = 3.38	H3 Master = ND 0-4 = N/A 4-8 = N/A 8-12 = N/A 11-12 CON = ND Comp = ND
A4 Master = 0.431 0-4 = ND 4-8 = ND 8-12 = 0.199 11-12(CON?)=0.071 Comp = 0.101	B4 Master = 0.215 0-4 = ND 4-8 = 0.76 8-12 = ND 7-8 ? CON = 4.56 Comp = 49 12-16 = 2.02 16-20 = ND	C4 Master = 0.251 0-4 = 0.313 4-8 = ND 8-12 = 0.314 11-12(CON?)=0.416 Comp = 5.77 12-16 = N/A 16-20 = N/A	D4 Master = 0.215 0-4 = ND 4-8 = ND 8-12 = 0.35 11-12 CON = 0.105 Comp = ND	E4 Open Excavation 8-11 = 1.57 11-12 CON = ND Comp = ND 12-16 = N/A 16-20 = N/A	F4 Open Excavation 8-11 = 0.8 11-12 CON = 2.3 12-16 = 0.4 16-20 = 2.32	G4 Open Excavation 8-12 = 10.7 12-16 = ND 16-20 = ND	H4 M < 4 ft = 56.2 4-8 ??? 7-8 CON = 1.68 8-12 = 3.48 12-16 = ND 16-20 = 14.2
A5 Master = 0.52 0-4 = 0.142 4-8 = 0.578 7-8 CONC = ND Comp = 11.1 8-12 = 4.46 (1016?) 12-16 = ND 16-20 = ND	B5 Master = 0.293 0-4 = ND 4-8 = 0.338 7-8.0(CON?)=0.277 Comp = 0.108	C5 Master = 0.30 0-4 = 0.217 4-8 = 0.956 7-8.0(CON?)=0.81 Comp = ND	D5 Master = 0.635 0-4 = ND 4-8 = 6.19 8-9 CON = 10.3 Comp = 17.4 9-12 = 8.07 12-16 = 0.23 16-20 = ND	E5 Open Excavation 3-4 CON = ND 4-8 = 0.96 8-12 = 2.23 12-16 = 1.38 16-20 = ND	F5 Open Excavation 8-12 = 15.4 12-16 = 5.9 16-20=ND	G5 M < 4 ft = 33.7 3-4 CON = ND 4-8 = 112 8-12 = 10.6 12-16 = 0.91 16-20 = ND	H5 M < 4 ft = 13.6 3-4 CON = 2.18 4-8 = 6.32 8-12 = 0.61 12-16 = 8.71 16-20 = 3.08
A6 Master = 33.8 0-4 = 63.69 4-8 = 3.86 7-9.8? CON = 30 Comp = ND	B6 Master = 61.43 0-4 = 3.63 4-8 = 50.1 8-12 = 53.4 12-15 = ND (15?) 16-20 = ND (15?)	C6 Master = 9.67 0-4 = 73.5 4-8 = 25.7 8-12 = ND 12-15 = ND (15?) 15-20 = 12.2 (15?)	D6 M < 4 ft = 61.43 4-6 CON = 17.7 Comp = 6.26 4-8 = 51.1 8-12 = 4.82 12-16 = 6.92 16-20 = ND	E6 M < 4 ft = 48.63 2-4 CON = 36.9 Comp = 33.2 4-8 = 58.7 8-12 = 27 12-16 = 1.09 16-20 = 0.25	F6 M < 4 ft = 25.17 0-4 = 30.2 (Dup?) 4-5 CON = 41.6 Comp = 2.27	G6 M < 4 ft = 23.4 3-4 CON = 0.71 4-8 = 43.3 8-12 = 16.4 12-16 = 0.64 16-20 = 0.15	H6 Master = 73.9 0-4 = 1 4-8 = 4.5 8-12 = 33.2 12-16 = 57.5 16-20 = 38.3 20-24 = 21.5
A7 Master = 0.21 0-4 = 0.591 4-8 = ND 8-12 = ND 12-16 = 0.54 16-20 = ND	B7 Master = 53 0-4 = 288 4-8 = ND 8-12 = 2.26 12-16 = ND 16-20 = 0.26	C7 Master = 116 0-4 = 191 4-8 = 38.9 8-12 = 0.37 12-16 = 0.14 16-20 = ND	D7 Master = 39 0-4 = 390 4-8 = 1.38 8-12 = 0.3 12-16 = 0.21 16-20 = 0.22	E7 Master = Held 0-4 = 181 4-8 = 119 8-12 = 340 12-16 = 0.374 16-20 = 0.182	F7 Master = Held 0-4 = 133 4-8 = 57.8 8-12 = 46.2 12-16 = 0.073 16-20 = ND	G7 Master = 31.2 0-4 = 385 4-8 = 76.4 8-12 = 25 12-16 = 15.1 16-20 = 2.32	H7 Master = 30.9 0-4 = 6.11 4-8 = 82.2 8-12 = 2.86 12-16 = ND 16-20 = 0.322
A8 0-4 = 8.89 4-8 = 110 8-12 = 74.4 12-16 = 122 16-20 = 33 20-24 = 2.12	B8 0-4 = 34.3 4-8 = 3.19 8-12 = 0.13 12-16 = ND 16-20 = 0.55	C8 0-4 = 125 4-8 = 19.8 8-12 = 0.16 12-16 = ND 16-20 = 0.49	D8 0-4 = 137 4-8 = 6.79 8-12 = 31 12-16 = 0.3 16-20 = 0.37	E8 0-4 = 366 4-8 = 157 8-12 = 1.89 12-16 = 159 16-20 = 53.1 20-24 = 0.64	F8 0-4 = 410 4-8 = 499 8-12 = 8.4 12-16 = 3.33 16-20 = 23.3	G8 (rev) 0-4 = 7 4-8 = 13 8-12 = 54.2 12-16 = 174 16-20 = 76 20-24 = ND	H8 0-4 = 50.6 4-8 = 338 8-12 = 194 12-16 = 9.98 16-20 = 36.6 20-24 = 1.84
A9 0-4 = 0.2 4-8 = ND 8-12 = ND 12-16 = ND 16-20 = ND	B9 0-4 = ND 4-8 = ND 8-12 = 0.11 12-16 = 0.16 16-20 = ND	C9 0-4 = 60.4 4-8 = ND 8-12 = 61.2 12-16 = ND 16-20 = ND	D9 0-4 = 16.9 4-8 = 1.56 8-12 = 1.19 12-16 = 0.33 16-20 = 0.1	E9 0-4 = 194 4-8 = 28 8-12 = 2.22 12-16 = 13.6 16-20 = 11.4	F9 0-4 = 28.6 4-8 = 153 8-12 = 3.85 12-16 = 414 16-20 = 0.44	G9 0-4 = 2.41 4-8 = 23.9 8-12 = ND 12-16 = 29.9 16-20 = 6.14	H9 0-4 = 0.65 4-8 = 0.21 8-12 = 0.27 12-16 = ND 16-20 = 0.27
		C10 0-4 = ND 4-8 = ND 8-12 = ND 12-16 = ND 16-20 = ND	D10 0-4 = 1.66 4-8 = 4.6 8-12 = ND 12-16 = ND 16-20 = 0.11	E10 0-4 = 7.34 4-8 = 478 8-12 = 1.89 12-16 = 1.1 16-20 = 1.02	F10 0-4 = 9.89 4-8 = 91.8 8-12 = 1.76 12-16 = 31.3 16-20 = 3.45	Can't sample Primary Clarifier	
		C11 0-4 = ND 4-8 = ND 8-12 = ND 12-16 = ND 16-20 = ND	D11 0-4 = 10.9 4-8 = 0.13 8-12 = 0.23 12-16 = 41.1 16-20 = ND	E11 0-4 = 11.4 4-8 = 1.8 8-12 = 37.6 12-16 = 1.29 16-20 = 36.9 20-24 = 0.78	F11 0-4 = ND 4-8 = 0.1 8-12 = 1.18 12-16 = 0.097 16-20 = 23.5		
			D12 Hit Clean Skimmer Line 9-Sep-09	E12 0-4 = 4.03 4-8 = 30.3 8-12 = 0.32 12-16 = ND 16-20 = 0.14	F12		
				E13			

I1 Master = ND 0-4 = N/A 4-8 = N/A 11-12 CON = ND Comp = ND	J1 M < 4 ft = 3.2 3-4 CON = ND Comp = 7.68 4-8 = 0.28 8-12 = 16.4 12-16 = 24.3 16-20 = 2.71	K1 Master = NA 0-4 = 2.35 4-8 = ND 8-12 = ND 12-16 = 19.3 16-20 = 0.39				
I2 Master = 0.557 0-4 = 0.319 4-8 = 0.284 7-8 CON = ND Comp = 0.169	J2 M < 4 ft = 3.25 3-4 CON = ND Comp = 11.1 4-8 = 0.36 8-12 = 53 12-16 = 14.3 16-20 = ND	K2 Master = NA 0-4 = 0.36 4-8 = 0.85 8-12 = 43.9 12-16 = 7.1 16-20 = 4.5	L2			
I3 Master = 0.113 0-4 = N/A 4-8 = N/A 7-8 CON = 0.277 Comp = 0.643	J3 M < 4 ft = 7.11 3-4 CON = ND Comp = 47.7 4-8 = 0.13 8-12 = 6.21 12-16 = 4.55 16-20 = ND	K3 Master = N/A 0-4 = 3.61 4-8 = 6.4 8-12 = 117 12-16 = 0.42 16-20 = ND	L3			
I4 Master = 0.193 0-4 = N/A 4-8 = N/A CON = ?? 8-12 = 7.12 12-16 = 0.32 16-20 = ND	J4 M < 4 ft = 11.27 3-4 CON = ND Comp = 1.89 4-8 = N/A 8-12 = N/A 12-16 = N/A 16-20 = N/A	K4 Master = NA 0-4 = 10.9 4-8 = 5.64 8-12 = 78.7 12-16 = 2.29 16-20 = ND	L4			
I5 M < 4 ft = 7.37 3-4 CON = 0.88 4-8 = 126 8-12 = 10.5 12-16 = ND 16-20 = ND	J5 M < 4 ft = 9.96 3-4 CON = 1.26 4-8 = 13.4 8-12 = 38.2 12-16 = 6.51 16-20 = 0.51	K5 Master = NA 0-4 = 49.7 4-8 = 66.2 8-12 = 76.4 12-16 = 6.16 16-20 = 0.5	L5	L5B		
I6 M < 4 ft = 5.8 Comp = 0.5 no need based on Comp	J6 M < 4 ft = ND Comp = 7.69 Results ???	K6 0-4 = 81.4 4-8 = 38.9 8-12 = 75.1 12-16 = 314 16-20 = 4.72	L6	M6	N6	O6
I7 Master = 13.1 0-4 = 0.496 4-8 = 3.55 8-12 = 22.6 12-16 = 2.18 16-20 = 23.7	J7 Master = 13.1 0-4 = 103 4-8 = 22.3 8-12 = 22.6 12-16 = 315 16-20 = 17.5	K7 0-4 = 17.2 4-8 = 10.9 8-12 = 11.8 12-16 = 5.34 16-20 = 17.3 20-24 = 0.713	L7	M7	N7	
I8 0-4 = 41 4-8 = 34.6 8-12 = 22 12-16 = 4.06 16-20 = 2.24	J8 0-4 = 32.4 4-8 = 16.5 8-12 = 12.9 12-16 = 13.4 16-20 = 21.6	K8 0-4 = 12.2 4-8 = 8.78 8-12 = 12.4 12-16 = 216 16-20 = 12.1	L8	M8	N8	
I9 0-4 = 0.12 4-8 = 0.5 8-12 = 1.59 12-16 = 6.99 16-20 = 2.08	J9 0-4 = 1.74 4-8 = 16.5 Can't sample Refusal	K9 0-4 = 0.49 4-8 = 0.1 8-12 = 58.4 12-16 = 0.32 16-20 = 28.7 20-24 = ND	L9	M9	N9	O9
			Can't sample Primary Clarifier	Can't sample Primary Clarifier	Maybe	N10

X8
0-4 = 23.9
4-8 = 42.4
8-12 = 13.5
12-16 = 25
16-20 = 9.4

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